

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

BOOZ ALLEN HAMILTON HOLDING
CORPORATION,

Plaintiff,

v.

RAMEZ TANNOUS SHEHADI

and

WALID FAYAD,

Defendants.

Civil Action No.
1:19-cv-00869-CMH-JFA

**JOINT MOTION TO VACATE CURRENT SCHEDULING ORDER IN LIGHT OF
SETTLEMENT IN PRINCIPLE**

1. Plaintiff/counterclaim defendant Booz Allen Hamilton Holding Corporation, third-party defendant Booz Allen Hamilton Inc., and defendants/counterclaim plaintiffs Ramez Tannous Shehadi and Walid Fayad, by counsel, have worked diligently to exchange information and to negotiate a settlement of this action.

2. The Parties reached an agreement in principle to settle this action. The settlement in principle will fully resolve the claims of all Parties. The Parties expect to be in a position to file a Stipulation of Dismissal once final settlement documents are executed.

3. Given the Parties' agreement in principle, the Parties respectfully request that the Court vacate the current Scheduling Order in this action, including the Final Pretrial Conference scheduled for July 16, 2020, so that the Parties can focus their attention on finalizing the settlement documents.

4. The Parties agree to waive a hearing on this Joint Motion.
5. A proposed Order is attached hereto as Exhibit A for the Court's consideration.

Date: July 10, 2020

Respectfully Submitted,

By: /s/ Benjamin S. Boyd

Benjamin S. Boyd (VA Bar No. 28427)
DLP PIPER LLP (US)
500 8th Street, NW
Washington, D.C. 20004
Telephone: (202) 799-4000
Facsimile: (202) 799-5000
E-mail: benjamin.boyd@dlapiper.com
Counsel for Plaintiff

By: /s/ B. Patrice Clair

B. Patrice Clair (VA Bar No. 80225)
FORDHARRISON LLP
1300 19th Street, NW, Suite 420
Washington, DC 20036
Telephone: (202) 719-2000
Facsimile: (202) 719-2077
E-mail: pclair@fordharrison.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 10th day of July, 2020, I caused the foregoing JOINT MOTION TO VACATE CURRENT SCHEDULING ORDER IN LIGHT OF SETTLEMENT IN PRINCIPLE to be electronically filed with the Court using the CM/ECF system which will then send electronic notification of the filing to the following:

Benjamin S. Boyd, Esq.
Virginia Bar No. 28427
500 8th Street, NW
Washington, D.C. 20004
Tel: (202) 799-4000
Fax: (202) 799-5000
Benjamin.boyd@us.dlapiper.com

Daniel Turinsky, Esq.
(admitted pro hac vice)
Britt C. Hamilton, Esq.
(admitted pro hac vice)
1251 Avenue of the Americas
New York, NY 10020
Tel: (212) 335-4500
Fax: (212) 335-4501
daniel.turinsky@dlapiper.com
britt.hamilton@dlapiper.com

*Counsel for Plaintiff Booz Allen Hamilton
Holding Corporation and Third-Party Defendant
Booz Allen Hamilton Inc.*

/s/ B. Patrice Clair

B. Patrice Clair
Virginia Bar No. 80225
FORDHARRISON LLP
1300 19th Street, N.W., Suite 420
Washington, DC 20036
Telephone: (202) 719-2000
Facsimile: (202) 719-2077
E-mail: pclair@fordharrison.com
*Attorneys for Defendants Ramez
Tannous Shehadi and Walid Fayad*